

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF SOUTH CAROLINA**  
**CHARLESTON DIVISION**

Steven Grinnell and Vanessa Grinnell, )  
 both Individually and as )  
 Parents/Guardians of K.G. and K.G, both )  
 minors, )

Plaintiffs, )

v. )

Tovarrian Bradford Russell and Roehl )  
 Transport, Inc., )

Defendants. )

Case No.: 2:23-cv-6131-RMG

**DEFENDANTS' RULE 26(a)(3)**  
**PRETRIAL DISCLOSURES**

Tovarrian Bradford Russell and Roehl Transport, Inc. (hereinafter "Defendants"), by and through its undersigned counsel, hereby provides its pretrial disclosures pursuant to FEDERAL RULES OF CIVIL PROCEDURE, 26(a)(3).

**(i) The name and, if not previously provided, the address and telephone number of each witness—separately identifying those the party expects to present and those it may call if the need arises.**

*Expected Witnesses*

Tovarrian B. Russell  
 4406 Woodwind Street  
 Charlotte, North Carolina 28213  
 (715) 591-3795

*Witnesses if the Need Arises*

Corporal J.D. Tuten  
 c/o South Carolina Department of Public Safety  
 10311 Wilson Boulevard  
 Blythwood, South Carolina 29106

In response to Plaintiffs' disclosures, Defendants reserve the right to supplement this response and call any witness previously identified in the course of discovery by Plaintiffs or Defendants.

Defendants reserve the right to cross examine any witnesses named by Plaintiffs and the right to call impeachment witnesses consistent with the FEDERAL RULES OF EVIDENCE.

**(ii) The designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition.**

Defendants do not anticipate presenting deposition testimony of any witness in lieu of the witness' physical presence at trial, as no depositions have yet been taken and discovery has concluded. However, Defendants reserve the right under Fed. R. Civ. P., 32(a)(2) to use deposition testimony to impeach the testimony of deponents when called as witnesses. Defendants also reserve the right to request complete portions of deposition testimony be presented in the event partial testimony is presented by Plaintiff.

**(iii) An identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises.**

*Expected Exhibits*

Dash camera footage from Defendant Tovarrian Russell's truck

*Exhibits if the Need Arises*

Any document exchanged during written discovery

Affidavit of Tovarrian Russell

Dash camera footage from investigating officer.

Defendants reserve the right to offer complete copies of excerpts identified by any other party to this case as well as material designated by other parties to this case.

Defendants further reserve the right to use demonstrative evidence at trial and to present impeachment evidence should the need arise.

*Signature Page to Follow*

Respectfully submitted,

**SWEENEY, WINGATE & BARROW, P.A.**

s/Jake M. Tillery

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March 3, 2025